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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

MIGUEL RODRIGUEZ, individually  
and on behalf of all others similarly  
situated,

Plaintiffs,

v.

Caesars Entertainment, Inc.,

Defendant.

Case No. 2:23-cv-01447-ART-BNW

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING TIME FOR  
DEFENDANT CAESARS  
ENTERTAINMENT, INC. TO RESPOND  
TO COMPLAINTS**

**(FIRST REQUEST)**

1 PAUL GARCIA, individually and on  
2 behalf of all others similarly situated,

3 Plaintiffs,

4 v.

5 Caesars Entertainment, Inc.,

6 Defendant.

Case No. 2:23-cv-01482-ART-BNW

7 ALEXIS GIUFFRE, individually and on  
8 behalf of all others similarly situated,

9 Plaintiffs,

10 v.

11 Caesars Entertainment, Inc.,

12 Defendant.

Case No. 2:23-cv-01483-ART-BNW

13 DAVID LACKEY, individually and on  
14 behalf of all others similarly situated,

15 Plaintiffs,

16 v.

17 Caesars Entertainment, Inc.,

18 Defendant.

Case No. 2:23-cv-01562-ART-BNW

19 THOMAS MCNICHOLAS and LAURA  
20 MCNICHOLAS, individually, and on  
21 behalf of all others similarly situated,

22 Plaintiffs,

23 v.

24 Caesars Entertainment, Inc.,

25 Defendant.

Case No. 3:23-cv-00470-ART-BNW

1 WHEREAS, *Rodriguez v. Caesars Entertainment, Inc.* No. 2:23-cv-01447-ART-BNW,  
2 was filed on September 15, 2023 (ECF No. 1);

3 WHEREAS, Defendant Caesars Entertainment, Inc. (“Caesars”) was served with the  
4 *Rodriguez* complaint on September 21, 2023 (Dkt. 6);

5 WHEREAS, pursuant to Fed. R. Civ. Proc. 12(a), Caesars’s response to the *Rodriguez*  
6 Complaint would otherwise be due on or before October 12, 2023;

7 WHEREAS, *Garcia v. Caesars Entertainment, Inc.* No. 2:23-cv-01482-ART-BNW, was  
8 filed on September 21, 2023 (Dkt. 1);

9 WHEREAS, Caesars was served with the *Garcia* complaint on September 25, 2023 (Dkt.  
10 7);

11 WHEREAS, pursuant to Fed. R. Civ. Proc. 12(a), Caesars’s response to the *Garcia*  
12 Complaint would otherwise be due on or before October 16, 2023;

13 WHEREAS, *Guiffre v. Caesars Entertainment, Inc.* No. 2:23-cv-01483-ART-BNW, was  
14 filed on September 21, 2023 (Dkt. 1);

15 WHEREAS, Caesars was served with the *Garcia* complaint on September 25, 2023;

16 WHEREAS, pursuant to Fed. R. Civ. Proc. 12(a), Caesars’s response to the *Guiffre*  
17 Complaint would otherwise be due on or before October 16, 2023;

18 WHEREAS, *McNicholas v. Caesars Entertainment, Inc.* No. 3:23-cv-00470-ART-BNW,  
19 was filed on September 22, 2023 (Dkt. 1);

20 WHEREAS, Caesars was served with the *Garcia* complaint on September 26, 2023;

21 WHEREAS, pursuant to Fed. R. Civ. Proc. 12(a), Caesars’s response to the *Garcia*  
22 Complaint would otherwise be due on or before October 17, 2023;

23 WHEREAS, *Lackey v. Caesars Entertainment, Inc.* No. 2:23-cv-01562-ART-BNW, was  
24 filed on September 29, 2023 (Dkt. 1);

25 WHEREAS, Caesars has yet to be served with the *Lackey* Complaint;  
26  
27  
28

1 WHEREAS, on October 4, 2023, the *Garica, Guiffre, McNicholas and Lackey* complaints  
2 were related to the *Rodriguez* complaint and transferred to the Honorable Anne R. Traum  
3 (*Rodriguez* Dkt. 10) (the “Related Actions”);

4 WHEREAS, on October 5, 2023, counsel for *Rodriguez, Garcia, Guiffre, McNicholas* and  
5 *Lackey* filed an Unopposed Motion to Consolidate Cases for Pre-Trial Proceedings (*Rodriguez*  
6 Dkt. 11) (the “Motion to Consolidate”);

7 WHEREAS, the Motion to Consolidate provides that all deadlines in all of the Related  
8 Actions are to be stayed, and further anticipates the filing of a consolidated complaint and  
9 proposed deadline for Caesars to respond to the consolidated complaint;

10 WHEREAS, the Court has yet to act on the Motion to Consolidate, and thus Caesars  
11 currently faces upcoming response deadlines in the Related Actions in which it has been served;

12 WHEREAS, to avoid unnecessary expenditure of resources and effort responding to  
13 individual complaints in the Related Actions where all Parties are agreed that the complaints  
14 should first be consolidated, and where the Motion to Consolidate is currently pending before the  
15 Court, the Parties have agreed to extend the time for Caesars to respond to the Complaints until  
16 forty-five (45) days following the service of a consolidated complaint, as requested in the Motion  
17 to Consolidate, or, if the Court denies the Motion to Consolidate, forty-five (45) days after the  
18 Court issues such decision. There is good cause to grant this request, which is not made for the  
19 purposes of delay.

20 It is therefore **STIPULATED** and **AGREED** that:

- 21 1. Defendant shall file and serve any answer or other response within forty-five (45)  
22 days of the filing of a consolidated complaint, if the pending Motion to  
23 Consolidate is granted.
  - 24 2. If the Motion to Consolidate is not granted, Defendant shall file and serve any  
25 answer or other response to the complaints in the Related Actions within forty-  
26 five (45) days of the Court’s decision.
- 27  
28

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Dated: October 11, 2023.

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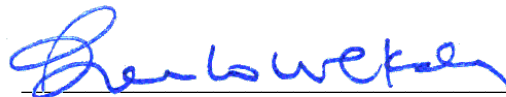
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**IT IS SO ORDERED:**



UNITED STATES DISTRICT JUDGE  
UNITED STATES MAGISTRATE JUDGE

DATED: 10/12/2023